

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:
NA'EEM TAMIR MCCOY

CHAPTER 13
CASE NO. 22-42902-MAR
JUDGE MARK A RANDON

Debtor _____ /

TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN

Now Comes the Chapter 13 Trustee, KRISPEN S. CARROLL, and files her objections pursuant to E.D. Mich. LBR 3015-3(a) and opposes confirmation of the Chapter 13 Plan where it does not comply with Bankruptcy Code provisions, 11 U.S.C. §§ 1325, 1322, other applicable provisions of Title 11 Chapter 13 and Local Bankruptcy Rules, as follows:

1. Based upon the pay stubs provided, it appears debtor has overstated the income disclosed on Schedule I by over \$1,100/mo. As such, Trustee questions the feasibility of debtor's Chapter 13 Plan pursuant to 11 U.S.C. § 1325 (a)(6).

Wherefore, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan and for other and further relief as the Court deems appropriate, including dismissal.

Dated: August 11, 2022

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ KRISPEN S. CARROLL-mcs

Krispen S. Carroll (P49817)

Margaret Conti Schmidt (P42945)

Maria Gotsis (P67107)

719 Griswold Street, Ste 1100

Detroit, MI 48226

(313) 962-5035

notice@det13ksc.com

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:
NA'EEM TAMIR MCCOY

CHAPTER 13
CASE NO. 22-42902-MAR
JUDGE MARK A RANDON

Debtor _____ /

CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

ACCLAIM LEGAL SERVICES
8900 E 13 MILE RD
WARREN, MI 48093

August 11, 2022

/s/ Shannon Horton

SHANNON HORTON

For the Office of the Chapter 13 Trustee-Detroit
719 Griswold Street, Ste 1100
Detroit, MI 48226
(313) 962-5035
notice@det13ksc.com